IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MOTION FOR ENTRY OF HIDGMEN	' T OF FORECI OSURE NUNC PRO TUN
Defendants	j
MANAGEMENT, INC,)
CAPITAL, LLC; MIDLAND CREDIT) Judge: Edmond E. Chang
BRENDA A. KING; STANLEY KING; UM)
	·)
V.)
Plaintiff)
SERIES 2006-SD3,)
THROUGH CERTIFICATES,) Case No: 1:12-CV-00296
TRUST 2006-SD3 MORTGAGE PASS)
COMPANY, AS TRUSTEE FOR GSAMP)
DEUTSCHE BANK NATIONAL TRUST)
DELITICATE DANIZ NATIONAL TRICT	

NOW COMES the Plaintiff, U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE UNDER THE POOLING AND SERVICING AGREEMENT, DATED AS OF JANUARY 1, 2004, 2004-CB1 TRUST, C-BASS MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2004-CB1, by and through its attorney, Kimberly J. Goodell, and moves this Honorable Court for Entry of Judgment of Foreclosure Nunc Pro Tunc to April 16, 2013. In support thereof, Plaintiff states as follows:

- 1. On January 13, 2012, Plaintiff filed its Complaint to Foreclose Mortgage.
- 2. On August 3, 2012 Plaintiff filed its Motion for Summary Judgment requesting the Court enter a judgment of foreclosure in favor of Plaintiff.
- 3. On April 16, 2013 the Court granted summary judgment in favor of the Plaintiff.
- 4. For reasons unknown to new counsel, a Judgment of Foreclosure was never entered in this matter.
- 5. Therefore, Plaintiff seeks a judgment of foreclosure nunc pro tunc April 16, 2013 so that Plaintiff may proceed with the sale of this foreclosed property.

WHEREFORE, Plaintiff respectfully requests that a Judgment of Foreclosure be entered in this case, with a nunc pro tunc date of April 16, 2013, so that the Plaintiff can move forward with the sale of this foreclosed property.

Respectfully submitted,	
/s/ Kimberly J. Goodell	

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